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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

GGCC, LLC, an Illinois Limited Liability
Company, Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

DYNAMIC LEDGER SOLUTIONS, INC., a
Delaware Corporation, TEZOS STIFTUNG, a
Swiss Foundation, KATHLEEN BREITMAN, an
Individual, and ARTHUR BREITMAN, an
Individual,

Defendants.

Case No. 3:17-cv-06779-RS

CLASS ACTION

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED
(CIVIL LOCAL RULES 3-12 AND 7-11)**

The Honorable Richard Seeborg

Action filed: November 26, 2017

[Caption continues on next page.]

This document also relates to:

ANDREW OKUSKO, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

DYNAMIC LEDGER SOLUTIONS, INC., THE
TEZOS FOUNDATION, KATHLEEN
BREITMAN, ARTHUR BREITMAN, and
TIMOTHY DRAPER,

Defendants.

Case No. 3:17-cv-06829-SI

The Honorable Susan Illston

Action filed: November 28, 2017

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on November 28, 2017, the case titled *Okusko v. Dynamic Ledger Solutions, Inc., et al.* (“*Okusko*”), Case No. 3:17-cv-06829-SI, was filed in the United States District Court for the Northern District of California.

Pursuant to Civil Local Rules 3-12 and 7-11, Plaintiff Andrew Okusko (“Plaintiff”), hereby moves the Court to consider whether the *Okusko* action should be related to the earlier filed action titled, *GGCC, LLC v. Dynamic Ledger Solutions, Inc., et al.*, Case No. 3:17-cv-06779-RS (“*GGCC*” and collectively with *Okusko*, the “Actions”).

Local Rule 3-12(a) provides that actions are related to another when: “(1) The actions concern substantially the same parties, property, transaction or event; and (2) It appears likely that there will be an unduly burdensome duplication of labor and expense or conflicting results if the cases are conducted before different Judges.” These criteria are met here. The plaintiff in each action invested in the Tezos ICO who brings suit under Sections 12(a)(1) and 15(a), 15 U.S.C. §§ 77l(a)(1), 77o(a), of the Securities Act of 1933, on behalf of a proposed Class, against the same defendants. Each complaint focuses on the same transactions and events, contains substantially similar allegations and seeks the same relief.

Given that similar parties, transactions, and events are involved in each Action, there will be an unduly burdensome duplication of labor and expense, and potentially inconsistent results, if the Actions were to be conducted before different judges. Accordingly, relating these Actions will serve

1 the interests of judicial economy and avoid the potential for conflicting results, consistent with Civil
2 Local Rule 3-12 (a).

3 Plaintiff respectfully requests that the *Okusko* be deemed related to *GGCC* pursuant to Local
4 Rule 3-12(a) and be reassigned to this Court for all further proceedings.

5 Respectfully submitted,

6 Dated: November 30, 2017

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PROOF OF SERVICE

I hereby certify that on November 30, 2017, I authorized the electronic filing of the foregoing:

1. ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES SHOULD BE RELATED (Civil Local Rules 3-12 and 7-11);
2. DECLARATION OF ROSEMARY M. RIVAS IN SUPPORT OF ADMINISTRATIVE MOTION TO CONSIDER WHETHER CASES SHOULD BE RELATED; and
3. [PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO RELATE CASES PURSUANT TO CIVIL L.R. 3-12

using the CM/ECF system, which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List maintained by this Court, and I hereby certify that I caused to be mailed the foregoing documents via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List maintained by this Court.¹

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 30, 2017, in San Francisco, California.

/s/ Rosemary M. Rivas
Rosemary M. Rivas

¹ Pursuant to Local Rule 3-12, a copy of this motion and the supporting documents are also being lodged with the judge(s) in each apparently related case, as well as served U.S. Mail on the parties to those actions that were not already served via CM/ECF.